

**UNITED STATES DISTRICT COURT  
IN THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**CLEMENT HAZEUR,**

Plaintiff,

vs.

**ARGENTS AIR EXPRESS, LTD.,**

Defendant.

Case No. 2:06-CV-12142

Hon. Gerald E. Rosen

Referral Judge: Steven R. Whalen

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**STIPULATED PROTECTIVE ORDER**

At a session of said Court held in the United States  
District Court, City of Detroit, County of Wayne, State  
of Michigan on September 19, 2006

PRESENT: HON. GERALD E. ROSEN  
U.S. DISTRICT COURT JUDGE

Upon the Stipulation of the parties in the above-captioned case, by and through their counsel, and this Court being fully advised in the premises;

**IT IS HEREBY ORDERED THAT:**

1. Documents produced by the parties may either be marked "Confidential", or designated "Confidential" in a separate writing.
2. All such "Confidential" documents produced by the parties pursuant to discovery requests, or by subpoena from third-parties, shall be kept in the custody and care of the non-

producing counsel of record in this action, and shall be disclosed and used only for the purposes of the conduct of this case and for no other purpose. All such information and documents and/or copies of documents shall be disclosed by counsel of record only to employees of counsel, experts retained by the parties, and/or persons identified as potential witnesses in this case, and said disclosure is to be made only to the extent essential to the preparation of this case and for no other purpose, and provided that counsel shall provide all such individuals with a copy of this Protective Order and all such individuals agree to be bound by the terms of this Protective Order.

3. Individuals who, pursuant to Paragraph 2 above, and by virtue of their participation in the conduct of this case, have knowledge of information and/or documents produced pursuant to this Protective Order, shall use such information and/or documents for the purposes of the conduct of this case and for no other purpose. Such individuals shall not disclose information obtained pursuant to these requests and documents, and/or copies of the documents themselves, to any person or persons not directly involved in the conduct of this case.

4. All documents produced by the parties subject to this stipulated order and all copies thereof shall be returned to their respective counsel, after a final resolution of this case, including any appeals.

s/Gerald E. Rosen  
Gerald E. Rosen  
United States District Judge

Dated: September 19, 2006

STIPULATED AS TO FORM AND CONTENT:

/s/ Gerald D. Wahl (w/consent)

Gerald D. Wahl (P26511)

Attorney for Plaintiff

/s/ Michael C. Gibbons

Michael C. Gibbons (P51304)

Victor A. Veprauskas IV (P59278)

Attorneys for Defendant